

EXHIBIT D

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November 16, 2016

Ronnie Spiegel
Jeniphr Breckenridge
Hagens Berman Sobol Shapiro LLP
1918 Eighth Ave., Suite 3300
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Re: *In re Automotive Parts Antitrust Litigation*, 2L12-md-02311

Dear Counsel:

As part of Honda's ongoing document production in response to the subpoenas served on various Honda-related entities in the above-referenced MDL, the email in which this letter was sent includes a FTP link to a volume titled MDLHONDA004. This volume contains documents bearing Bates numbers MDLHONDA00000719 - MDLHONDA00001765. This production includes the following documents and data:

- Detailed cost simulation system (CSS) data for every Honda major model manufactured in the United States since 2005. This CSS data includes all components of the vehicle, the suppliers, and the part cost immediately prior to mass production.
- Operations and procedure documents governing Honda's use of maker layout evaluation forms (MLEFs), including the criteria on which Honda evaluates suppliers and their bids.
- Honda's purchasing contracts with wire harness, bearings and anti-vibrational rubber parts suppliers, to the extent they could be located after a reasonably diligent search.
- Quarterly cost quotations for all vehicles sold by American Honda Motor Company, Inc. since 1998. These cost quotations reflect the price at which the manufacturing plant sells all vehicles to American Honda Motor Company, Inc. (the sole distributor of Honda vehicles in North America).
- A description of all incentive programs for which Honda has been able to locate information, without any date cutoff.
- Model master spreadsheet detailing the plant of manufacture, model name, model year date, and specifications for 2002 until mid-2013.

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Honda has designated all of the materials in MDLHONDA004 as either HIGHLY CONFIDENTIAL-OUTSIDE ATTORNEYS ONLY or CONFIDENTIAL under the Protective Order in the MDL. The materials in MDLHONDA004 designated outside attorneys eyes only are proprietary and extremely competitively sensitive, and Honda would be irreparably harmed by any disclosure to anyone other than outside counsel in this matter, including but not limited to Honda's competitors and/or suppliers.

The files are encrypted. The password will be sent to you in a separate email. As Honda's liaisons to the serving parties, I trust that you will ensure that this production is distributed among the serving parties as necessary.

Very truly yours,

KEKER & VAN NEST LLP

/s/ Justina Sessions

Justina Sessions

JS:slb